

Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2012

Date filed: February 14, 2013

Name of company covered by this certification: NT Network Services, LLC

Form 499 Filer ID: 828915

Name of signatory: Richard L. Monto

Title of signatory: Vice President

I, Richard L. Monto, certify that I am an authorized officer of the company named above and file this response acting as an agent of the company (the "Company"). The Company is a private carrier and therefore does not need to comply with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq. Notwithstanding that the Company is not required to comply with such rules, I nonetheless certify that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.

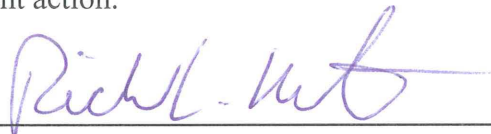
Attached to this certification is an accompanying statement explaining (1) that the Company is a private carrier and (2) how the Company's procedures ensure that the Company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

The Company has not taken any actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The Company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The Company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

SIGNED _____



Richard L. Monto
Vice President
NT Network Services, LLC

STATEMENT REGARDING OPERATION AS A PRIVATE CARRIER AND OF COMPLIANCE WITH CPNI RULES

NT Network Services, LLC (the "Company") provides only data capacity services to a related affiliate. Since the Company's only customer throughout 2012 was its related affiliate and for a variety of other reasons, the Company only provided private carrier service during 2012. Thus, the Company was not a "telecommunications carrier" during 2012 for purposes of Subpart U of the Commission's rules, and was not required to file a compliance certificate.

Notwithstanding that the Company need not provide a CPNI certification, the Company does comply with CPNI requirements. The Company has elected to utilize or provide CPNI only for marketing purposes that are permissible without customer approval in accordance with 47 C.F.R. § 64.2005. Thus, except as described below, the Company does not use CPNI for marketing purposes in a manner that requires customer approval and is not required to implement a system by which the status of a customer's CPNI approval can be established prior to the use of CPNI. For example, the Company uses, discloses or permits access to CPNI for marketing purposes in the context of marketing its offerings to existing customers. Thus, the Company may use CPNI to market a higher capacity circuit to a customer that is over-utilizing its existing lower capacity circuit(s). In addition, as permitted by the CPNI rules, the Company uses CPNI (1) to initiate, render, and bill and collect for telecommunications services rendered; (2) to protect rights or property of the Company, other users or other carriers from unlawful use; (3) to provide any inbound telemarketing or administrative services for the duration of a call; (4) for the purpose of providing customer premises equipment and protocol conversion; and (5) in order to provision inside wiring, maintenance and repair services.

The Company has implemented processes and procedures to train its personnel (if any) as to when they are and are not permitted to use CPNI. For instance, all Company employees (if any) are required to abide by the Company's Code of Conduct, which requires employees to maintain the confidentiality of all information that is obtained as result of their employment by the Company. In addition, designated employees with access to CPNI are also required to abide by the Company's CPNI Protection Policy. Employees who violate either the Company's Code of Conduct or CPNI Protection Policy may be subject to discipline, including possible termination.

The Company has not adopted procedures with respect to the failure of opt-out mechanisms because, as explained above, the Company does not engage in any marketing that would require such consent. But, in the event the Company modifies its marketing practices, the Company will adopt such procedures in conformity with the rules.

The Company does not use independent contractors to engage in marketing efforts on behalf of the Company nor do third parties have access to CPNI except as detailed above.

The Company does not currently engage in any large-scale coordinated sales and marketing campaigns based on CPNI. A significant amount of the Company's marketing is focused on existing customers in areas where the Company has built new facilities and, when CPNI is used, is limited to those instances where customer approval is not required as detailed above.

The Company has implemented procedures to provide law enforcement with notice should a breach of CPNI occur. After notifying law enforcement and unless directed otherwise, the Company will notify affected customers. The Company will maintain a record of any CPNI-related breaches for a period of at least two years.

The Company has implemented procedures whereby it will not provide CPNI without proper customer authentication. In order to authenticate a customer's identity prior to disclosing CPNI, the Company authenticates the customer using a variety of methods. Call detail records are provided on-line or via e-mail, U.S. mail or overnight business courier.